

EXHIBIT 48

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHARLES JOSEPH FREITAG, JR., as	:	
ADMINISTRATOR of the ESTATE OF	:	
CHARLES JOSEPH FREITAG, SR.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 2:19-cv-05750-JMG
	:	
BUCKS COUNTY; PRIMECARE MEDICAL,	:	
INC.; STEPHAN BRAUTIGAM, PMHNP;	:	
JESSICA MAHONEY, PSY.D; AVIA JAMES,	:	
LPC; CHRISTINA PENGE, LPC; JOHN	:	
DOES 1-10,	:	
	:	
Defendants.	:	
	:	

NOTICE OF ORAL DEPOSITION

TO: Jeffrey M. Kolansky, Esq.
Jeffrey M. Scott, Esq.
Counsel for Buck County Defendants

PLEASE TAKE NOTICE that on Wednesday, May 5, 2021, at 9:30 a.m., pursuant to Fed. R. Civ. P. 30(b)(6), plaintiff will conduct the deposition upon oral examination of a designee(s) of defendant Bucks County in relation to the matters outlined below.

The deposition will be conducted remotely via Zoom, using a link to be provided by the undersigned's court reporting service. The deposition will be held before a person duly authorized to administer oaths and will be recorded by stenographic means. Counsel will also make a video and audio recording of the deposition using Zoom's recording function.

Defendant Bucks County is advised that for purposes of this deposition it must designate one or more officers, directors, managing agents, or other persons who will testify on its behalf regarding the following:



1. Bucks County's policies, practices, and procedures in and around August 2018 regarding the responsibility of correctional officers and supervisors at the Bucks County Correctional Facility to conduct cell checks for persons placed on a Level 3 watch status.

2. Bucks County's policies, practices, and procedures in and around August 2018 regarding the responsibility of correctional officers and supervisors at the Bucks County Correctional Facility to supervise "inmate monitors" and ensure their compliance with obligations to conduct cell checks for persons placed on a Level 3 watch status.

3. Bucks County's policies, practices, and procedures in and around August 2018 regarding the training and supervision of correctional officers as to the responsibilities described in ¶¶ 1-2.

4. Bucks County's policies, practices, and procedures in and around August 2018 regarding the monitoring of officers and supervisors' compliance with the responsibilities described in ¶¶ 1-2 and any discipline imposed on an officer or supervisor between the years 2013 and 2018 due to any noncompliance with those responsibilities.

5. Bucks County's policies, practices, and procedures in and around August 2018 regarding precautionary measures to address the risk of suicide or self harm upon a person's return from court to the Bucks County Correctional Facility and, to the extent any such policies, practices, or procedures, have changed since August 2018, the nature of, and reasons for, any such changes.

6. Bucks County's policies, practices, and procedures in and around August 2018 regarding the availability of mental health professionals to meet with a person upon that person's return from court to the Bucks County Correctional Facility and, to the extent any such policies,

practices, or procedures, have changed since August 2018, the nature of, and reasons for, any such changes.

/s/ Jonathan H. Feinberg
Jonathan H. Feinberg
Counsel for Plaintiff

DATE: April 28, 2021

cc: John Ninosky, Esq.
Counsel for PrimeCare Defendants